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5 Attorney for Plaintiffs

6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE DISTRICT OF ARIZONA  
8 PRESCOTT DIVISION

8 Tony Manzo, *et al.*

No. 3:22-cv-8081-PCT-JJT

9 Plaintiffs,

10 v.

**DECLARATION OF DIANA  
WOOD**

11 Engrained Cabinetry and Countertops,  
12 LLC, Inspired Closets of Arizona, LLC,  
and Thomas Corkery,

13 Defendants.

14 I, Diana Wood, do hereby swear, affirm and attest as follows, based upon my  
15 personal knowledge of the matters contained herein:

16 1. My name is Diana Wood; I am over the age of 18 and duly qualified to  
17 execute this declaration.

18 2. I worked for Defendants Engrained Cabinetry and Countertops, LLC,  
19 and Thomas Corkery as a designer/salesperson from approximately April 2021 until  
20 March 2022.

1           3.     As a designer/ salesperson, I designed and sold closet and storage  
2 solutions for Defendants' customers according to the customer and Defendants' needs  
3 and specifications.

4           4.     Specifically, I used a computer program to design custom storage  
5 solutions for Defendants' customers.

6           5.     I was paid an hourly wage for the first three weeks of my employment  
7 while I was training on my job duties. Following those first three weeks, I received no  
8 income whatsoever until I was able to earn commissions. After the weeks of training,  
9 my sole source of income was commissions on sales..

10          6.     My design work for customers took more than 40 hours per week. To  
11 run a design from start to finish, I had to physically take measurements of the space I  
12 was designing for, interview the customer about their needs and budget, run price  
13 points on all materials required, create the physical design, and create a quote for the  
14 customer.

15          7.     If the customer moved forward, I also supervised the installation process  
16 and ensured everything was to customer satisfaction.

17          8.     The amount of time this took obviously varied based on the size of the  
18 job; some could take as little as 20 hours and some could take several weeks. I ran  
19 about 10 jobs at a time.

20          9.     Because my income was commission-based, the more sales I made the  
21 more income I earned. I regularly worked after business hours in order to finish up  
22

1 quotes and designs so that I could move projects forward. Defendants didn't ask me  
2 not to work after-hours, nor did they require me to track my time.

3 10. I probably worked at least 45 hours per week solely on making designs  
4 and quotes.

5 11. I hardly ever received my full commission. Other than paying back the  
6 draw, Defendants deducted portions of my commission for any error I made in the  
7 design such as a mismeasurement or an incorrect material.

8 **PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF**  
9 **PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA**  
10 **THAT THE FOREGOING IS TRUE AND CORRECT.**

11 Executed on this 25th day of October, 2023.

12 *Diana Wood*  
13 DIANA WOOD  
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